

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

R.K.,

Plaintiff,

v.

THE CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, a Utah corporation
sole,

Defendant.

NO. 04-2338 RSM

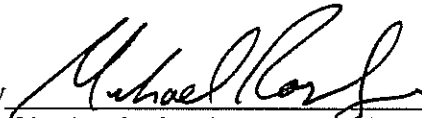
DEFENDANT'S PROPOSED
JUDICIAL NOTICE
INSTRUCTION RE: AMENDED
COMPLAINT AND ALLENBACH
COMPLAINT

Defendant requests that the attached Judicial Notice Instruction be read during the
presentation of defendant's case.

DATED this 10 day of October, 2006.

GORDON MURRAY TILDEN LLP

By



Charles C. Gordon, WSBA #1773

Jeffrey I. Tilden, WSBA #12219

Michael Rosenberger, WSBA #17730

Attorneys for Defendant The Corporation of the
President of The Church of Jesus Christ of
Latter-Day Saints

DEFENDANT'S PROPOSED JUDICIAL NOTICE
INSTRUCTION RE: AMENDED COMPLAINT AND
ALLENBACH COMPLAINT - 1

GORDON MURRAY TILDEN LLP
1001 Fourth Avenue, Suite 4000
Seattle, WA 98154
Phone (206) 467-6477
Fax (206) 467-6292

**JUDICIAL NOTICE OF COMPLAINT FOR DAMAGES
AGAINST ALLENBACH AND COMPLAINT IN THIS CASE**

The Court has decided to accept as proved the following facts:

- On June 1, 2006, Robert Kelly filed a Complaint for Damages against the Estate of Herman M. Allenbach and Veloy S. Allenbach, his wife, in King County Superior Court. The cause number of the action is 06-2-18132-8, pending before the Honorable Christopher A. Washington.
- The Complaint alleges in paragraph 3.7 that in approximately 1970 or 1971, Mr. Kelly's brother disclosed to the Kelly parents that Loholt had masturbated and ejaculated in front of him.
- The Complaint alleges in paragraph 3.8 that the Kelly parents confronted the Allenbachs in their home about Loholt, that Dr. Allenbach attempted to calm the Kelly parents and assured them that he would "take care of it," and that despite this warning, Veloy Allenbach and Dr. Herman Allenbach failed to report Loholt to civil authorities and continued to allow Loholt to reside for several years in their home and later in a trailer located adjacent to their property.
- Mr. Kelly is represented in that lawsuit by the same counsel representing him in this proceeding.

The Court has also decided to accept as proved the following fact:

- Mr. Kelly's Complaint in this case was filed March 28, 2005.
- Paragraph 3.7 of that Complaint alleges that in approximately 1970-71, Loholt masturbated and ejaculated in front of boys. Plaintiff's parents later complained to Dr. Allenbach. Allenbach told them he would "take care of it."

9th Cir. Model Civ. Jury Instr. 2.5 (mod.)

Defendant's Authority: As set forth in its Trial Brief, Defendant contends that Plaintiff's allegation in his Complaint in this case that the abuse occurred in "approximately 1970-1971" is more than relevant—it is a judicial admission binding upon plaintiff. However,

1 for present purposes, assuming the Court does not dismiss plaintiff's claim, then this allegation is
2 at least relevant to the question of the timing of the abuse and the jury should be so advised.

3 The allegations in the new *Estate of Allenbach* complaint are relevant for the same reason—
4 plaintiff has, once again, alleged that the abuse occurred prior to any notice to the church. The
5 allegations in this new complaint are plainly relevant and are the proper subject of judicial notice
6 because the Superior Court filing is, according to the test cited by plaintiff, "capable of accurate
7 and ready determination."
8

9 As to Plaintiff's objections to this instruction, COP responds as follows:
10

11 Plaintiff objects, first, on the ground that allegations in question are "disputed substantive
12 allegations." However, whether plaintiff is now contradicting his own factual allegations is
13 irrelevant. The requested jury instruction does not instruct that the jury must accept the
14 allegations as true, but simply instructs the jury that *plaintiff made them*. If the instruction is
15 given, it remains for the jury to determine what weight to give this evidence.
16

17 Second, plaintiff objects that advising the jury of the *Estate of Allenbach* allegations is
18 unfairly prejudicial because plaintiff would be "placed in the position of having to explain" why
19 he is suing the purported agent of the Church, Dr. Allenbach. COP sees no prejudice to plaintiff
20 if he chooses not to explain this, nor any prejudice if he chooses to do so. Plaintiff's bare
21 allegation of prejudice does not make it so. Plaintiff also complains that the instruction
22 introduces a new "at fault" entity, Veloy Allenbach. However, no jury instruction will ask the
23 jury to determine Mrs. Allenbach's fault, and COP's proposed verdict form does not ask the
24 jurors to assign fault to Mrs. Allenbach. The objection is without merit.
25

26 Finally, the Court should decline to give Plaintiff's requested instruction regarding the
27 portion of COP's Answer regarding Dr. Allenbach. As the Court knows, this action originally
28

1 had four plaintiffs. Those other plaintiffs were abused long after the abuse of plaintiff R.K., and
 2
 3 the Complaint included allegations about Loholt's conduct through 1980. *See*, Amended
 4
 5 Complaint ¶¶ 3.9 (alleging complaints to Bishop Borland in 1971- 1973) and 3.12 ("For the next
 6
 7 seven years, Loholt sodomized and molested young boys") (emphasis added). Thus, the
 8
 9 "relevant period" for purposes of the Complaint and Answer extended through the late-1970s
 10
 11 and even past 1980.

12
 13 Whatever volunteer positions Dr. Allenbach may have had during the late-1970s are
 14
 15 irrelevant to this action, which focuses on the period prior to 1973. Plaintiff has presented
 16
 17 absolutely no evidence that Dr. Allenbach was in the bishopric or was involved in Scouting; in
 18
 19 fact, the testimony has been expressly to the contrary. Hence, plaintiff's requested instruction
 20
 21 should not be given because COP's admissions as to later periods are irrelevant, and it would be
 22
 23 inaccurate and misleading to give plaintiff's requested instruction.

24 25 **Defendant's Objection:**

26 27 **1. The Defendant's proposed "evidence" does not meet the standards for** 28 **judicial notice.**

29
 30 Defendant asks this court to take judicial notice of disputed substantive allegations
 31
 32 contained in a separate complaint, filed in state court, involving different parties. Under Federal
 33
 34 Rules of Evidence (FRE) 201, a judicially noticed fact must be one not subject to reasonable
 35
 36 dispute in that it is either (1) generally known within the territorial jurisdiction of the trial court
 37
 38 or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot
 39
 40 reasonably be questioned.

41
 42 Here, Defendant is obviously aware that the allegations in the *Estate of Allenbach*
 43
 44 complaint are not established as verities merely by their inclusion in an initial complaint.
 45

1 Moreover, Plaintiff has already responded to the Defendant's proposed "judicial notice"
2
3 instruction in the Joint Disputed Jury Instruction (Proposed Instruction No. 38) as follows:
4

5 This "fact" is wholly disputed. The language in plaintiff's complaint was pled prior to
6 discovery and contradicts witness testimony, including the plaintiff's own testimony. For
7 these reasons, it should, therefore, not be given as an instruction to the jury. The drafting
8 of the complaint does not render the "fact" stipulated, especially in "notice" pleading. To
9 consider this fact stipulated would be prejudicial to plaintiff.
10

11 The Plaintiff utilized the "notice" pleading rules in the *Estate of Allenbach* complaint and alleged
12 that incidents occurred in "approximately" 1970 or 1971. Simply because the Plaintiff did not
13 amend the initial pleading does not render the time of the abuse an undisputed "fact" on which
14
15 the Court should advise the jury. There has been testimony in the case as to when the abuse
16
17 occurred. This is a question of fact for the jury to decide.
18
19
20

21 **2. Introducing allegations from the *Estate of Allenbach* complaint is unfairly**
22 **prejudicial, and will confuse and mislead the jury.**
23

24 The evidence that Defendant is attempting to admit is confusing to the jury and overly
25 prejudicial to the Plaintiff in violation FRE 403. The *Estate of Allenbach* action seeks damages
26 independent of the damages sought against the Mormon Church. It is well established that an
27 agent can be held independently liable for his or her own actions. Here, the Plaintiff believes
28 that Herman Allenbach was an agent of the Church, and as such, may be independently liable for
29 his own actions. *Monty v. Peterson*, 85 Wn.2d 956, 540 P.2d 1377 (1975). Plaintiff should not
30 be placed in the position of having to explain this irrelevant fact to the jury in this case.
31
32
33

34 Moreover, introducing the *Estate of Allenbach* complaint introduces a new at-fault entity.
35
36 Veloy Allenbach is a defendant in the *Estate of Allenbach* action. However, the Defendant here
37
38 has never sought to name Veloy Allenbach as a potentially at-fault party in this case. Defendant
39
40
41
42
43
44
45

1 should not be able to "back door" in a new at-fault entity the day before this matter is scheduled
2
3 to go to the jury.
4

5 **3. The Court should take judicial notice of Defendant's admissions here.**
6

7 The Plaintiff requests that the Court take judicial notice of facts that are alleged by the
8
9 Plaintiff and admitted by the Defendant in this case. The Plaintiff alleged in the complaint the
10
11 following:
12

13 DR. HERMAN M. ALLENBACH was at relevant times a High Priest, Bishopric
14 Counselor and Scout leader in the Kent 2nd Ward of the Church of Jesus Christ of Latter-
15 day Saints and he was their agent. . . .¹
16

17 In answering the Complaint, the Defendant denied that Allenbach was its agent but admitted that
18
19 Allenbach was a high priest, bishopric counselor and scout leader stating, in pertinent part:
20

21 Answering paragraph 1.12 of plaintiffs' Amended Complaint, defendants admit that
22 Herman M. Allenbach, as a male member of the church, participated in the lay priesthood
23 of the church, as that term is defined and understood within the LDS Church, and that
24 Mr. Allenbach had been a high priest, a counselor to the bishopric of the Kent Second
25 Ward, and a scout leader. . . .²
26

27
28 This admission by the Defendant is an established fact and the jury should be so advised.
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45

¹ Plaintiff's Amended Complaint, ¶1.12 (Dkt. No. 29).


² Defendant's Answer to Plaintiff's Amended Complaint, ¶12 (Dkt No. 33).

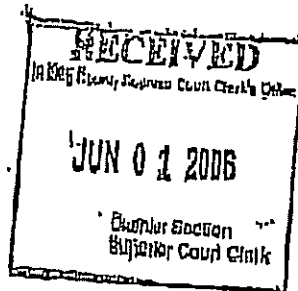
CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following. The parties will additionally be served in the manner indicated.

Michael T. Pfau Gordon, Thomas, Honeywell, Malanca, Peterson & Daheim LLP P.O. Box 1157 Tacoma, WA 98401-1157 Telephone: (206) 676-7500 Facsimile: (206) 676-7575 E-Mail: mpfau@gth-law.com <input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Fax <input type="checkbox"/> Federal Express	Timothy D. Kosnoff Law Offices of Timothy D. Kosnoff, P.C. 600 University Street, Suite 2101 Seattle, WA 98101 Telephone: (206) 676-7610 Facsimile: (425) 837-9692 E-Mail: timkosnoff@comcast.net <input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Fax <input type="checkbox"/> Federal Express
--	--

GORDON MURRAY TILDEN LLP

By 
Michael Rosenberger, WSBA #17730
Attorneys for Defendant The Corporation of the
President of The Church of Jesus Christ of
Latter-Day Saints
1001 Fourth Avenue, Suite 4000
Seattle, WA 98154-1007
Telephone: (206) 467-6477
Facsimile: (206) 467-6292
Email: mrosenberger@gmtlaw.com



10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

RK, DF, TD, JA, KF and CWB,

Plaintiffs,

vs.

VELOY S. ALLENBACH and the ESTATE OF
DR. HERMAN M. ALLENBACH,

Defendants.

06-2-18132-8ENT

COMPLAINT FOR DAMAGES

CHRISTOPHER A. WASHINGTON

COME NOW plaintiffs RK, DF, TD, JA, KF and CWB, by and through their undersigned attorneys of record Michael T. Pfau of Gordon, Thomas, Honeywell, Malanca, Peterson & Dahm, LLP and Timothy D. Kosnoff, Law Offices of Timothy D. Kosnoff, and hereby state and allege as follows:

I. PARTIES

1.1 Plaintiffs RK, DF, TD, JA CWB are adults and at all times relevant hereto were residents of the State of Washington. At all relevant times plaintiffs were children living with their parents in the Kent area.

COMPLAINT FOR DAMAGES - 1 of 8

0
[162158 v1.doc]

LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHM LLP
ONE UNION SQUARE
SUITE 2000, SUITE 2000
SEATTLE, WASHINGTON 98101-3199
PHONE 206-464-7100 - FACSIMILE 206-464-1574

1.2 Dr. Herman Allenbach was a prominent Kent-area oral surgeon and the owner of Northwest Oral Surgery. Allenbach also owned and managed commercial and residential rental properties located throughout south King County. At all relevant times Dr. Allenbach was a resident of King County, Washington. Dr. Allenbach died March 6, 2000. At all relevant times, Dr. Allenbach was a mandatory child abuse reporter under R.C.W. 26.44.030.

1.3 Defendant Estate of Dr. Herman M. Allenbach, 00-4-01191-9 KNT was filed was filed April 14, 2000 in King County, Washington. Brent Allenbach is the personal representative of the Estate of Dr. Herman M. Allenbach.

1.4 Defendant Veloy Allenbach was the wife of Dr. Herman Allenbach. At all relevant times she resided with her husband at 25929 152nd SE, Covington, Washington. Veloy Allenbach is presently a domiciliary of the state of Utah.

1.5 Jack Allen Loholt a/k/a Jack Allen Onofrey, (DOB: 10/13/45) is a twice-convicted, compulsive sexual predator of children. At all relevant times, Loholt was a resident of the State of Washington. Loholt presently resides in La Hache, BC, Canada.

II. JURISDICTION AND VENUE

2.1 The subject matter hereof and the parties hereto, is subject to the jurisdiction of the above-entitled court; and that venue is proper.

III. FACTS

3.1 On information and belief, Dr. Herman Allenbach and his then-wife, Veloy Allenbach, and Jack Allen Loholt became friends and business associates sometime in the 1960's. Loholt was the Allenbachs' friend, handyman and longtime protégé. Dr. Allenbach and Loholt were Elders in the Mormon Church and served together as Scoutmaster and assistant Scoutmaster in the Kent 2nd Ward of the Mormon Church.

COMPLAINT FOR DAMAGES - 2 of 8
0
[162358 v.1.doc]

IAN O'NEIL
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHEIN LLP
2011 Union Avenue
200 UNIVERSITY SUITE 2100
SEATTLE, WASHINGTON 98101-4185
206 475-7800 • FACSIMILE 206 475-7111

1 3.2 Throughout a period of over twenty years, Loholt lived on various properties
2 owned by or adjacent to property owned by the Dr. and Mrs. Allenbach, including a basement
3 apartment in the Allenbach home and rental properties located on a residential compound
4 owned by Veloy and Dr. Allenbach.
5

6 3.3 On information and belief, in approximately 1969 Loholt moved into the
7 downstairs apartment in the Allenbach residence located at 25929 152nd SE, Covington, WA.
8

9 3.4 Beginning in approximately 1969, Loholt began sexually abusing the
10 Allenbach children and their children's friends within their home and on other properties
11 owned by the Allenbachs.
12

13 3.5 In approximately, 1970, one of the Allenbach children told his parents that
14 Loholt had been sexually abusing him.
15

16 3.6 After the son's disclosure, defendants failed to protect their children from
17 Loholt, failed to warn their children's friends or parents, failed to warn neighbors and failed to
18 report Loholt to law enforcement. Instead, they continued to give Loholt unfettered access to
19 their children and their children's friends.
20

21 3.7 In approximately 1970 or 1971, R.K.'s brother disclosed to his parents that
22 Loholt had masturbated and ejaculated in front of him.
23

24 3.8 R.K.'s parents confronted the defendants in their home about Loholt.
25 Dr. Allenbach attempted to calm R.K.'s parents and assured them that he would "take care of
26 it." Despite this warning, Veloy Allenbach and Dr. Herman Allenbach failed to report Loholt
27 to civil authorities, failed to warn other children and parents, including other plaintiffs or their
28 parents and continued to allow Loholt to reside for several years in their home and later in a
trailer located adjacent to their property.

COMPLAINT FOR DAMAGES - 3 of 8

0
[102358 v2.doc]

LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHLUM LLP
ONE UNION SQUARE
SUITE 2100
SEATTLE, WASHINGTON 98101-3100
PH: 206-461-1100 FAX: 206-461-1101

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

3.9 For the next ten years, Loholt continued to sexually abuse numerous other children he came in to contact with through his association with Allenbach family and through the defendants' introduction of Loholt to other victims that were members of the Allenbachs' local ward of the Mormon Church. Loholt's victims included all of the plaintiffs named in this action.

3.10 In approximately 1979 Loholt moved to Canada where he formed a scout troop and molested numerous boys. Loholt was convicted of sexually abusing several boys in Ontario, Canada and went to prison for those crimes. Following his release from prison in Canada Loholt returned to Kent and again resided on property adjacent to or owned by the defendants Allenbach.

3.11 Between October 1985 and August 1988, C.W.B. and her family rented a residential property owned by defendants Allenbach which was located at 29105 148th Ave SE in Kent. Loholt lived on an adjacent property in a trailer and befriended her family.

3.12 On information and belief, defendants Allenbach knew or should have known that Loholt was a dangerous, serial sexual predator of children with a criminal history of raping children, when it gave him ready access to plaintiffs and/or failed to warn or protect parents or report him to the civil authorities.

3.13 Between October 1985 and August 1988, Loholt subjected C.W.B. to hundreds of acts of sexual abuse. During one incident of sexual abuse, Loholt told C.W.B. that he had had sexually molested more than two-hundred and fifty children.

3.14 C.W.B. disclosed the abuse to her parents in 1990. Loholt was subsequently arrested, prosecuted and convicted of the sexual abuse of C.W.B. in 1991 and was sentenced to prison.

COMPLAINT FOR DAMAGES - 4 of 8

0
[162358 v3.doc]

LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DANIEL LLP
ONE LAMAR SQUARE
SEATTLE, WASHINGTON 98101-4123
206 465 7100 - FACSIMILE (206) 465 7101

IV. FIRST CAUSE OF ACTION --
(NEGLIGENCE AND BREACH OF FIDUCIARY DUTY)

4.1 Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth under this count and further allege:

4.2 Defendants Allenbach had a "special relationship" with each and every plaintiff and with Jack Loholt.

4.3 Defendants Allenbach knew that Loholt was a pedophile who was actively abusing children and had a duty to warn or protect foreseeable victims including plaintiffs.

4.4 Furthermore, at all relevant times, Dr. Herman Allenbach was a mandatory child abuse reporter pursuant to R.C.W. 26.44.

4.5 Defendants breached both the statutorily proscribed duty and the common law duty of reasonable care by failing to report their knowledge of Loholt's sexual abuse of children to civil authorities.

4.6 Defendants breached a common law duty of reasonable care by failing to protect or warn plaintiffs or their parents of Loholt's dangerous propensities.

4.7 Defendants, as owners and/or possessors of the land upon which they knowingly and/or negligently allowed Loholt to groom and sexually abuse children, breached a common law duty to protect plaintiffs from an unreasonable risk of harm arising from Loholt's presence on the properties.

4.8 But for the defendants' breach of duty, acts and omissions Loholt would not have been able to abuse plaintiffs because Loholt would have been arrested, prosecuted and convicted or would have been in prison or under an order of supervision or would otherwise have been publicly identified as a child molester.

COMPLAINT FOR DAMAGES - 5 of 8

0
[162358 v3.doc]

LAW OFFICE
HENDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & CAHEIM LLP
ONE BRICK HOUSE
500 UNIVERSITY, SUITE 2100
SEATTLE, WASHINGTON 98101-4128
206 467-7800 • FACSIMILE 206 467-7878

4.9 Defendants know, or in the exercise of reasonable care should have known, that their failure to report Loholt's sexual abuse to appropriate law enforcement or social services agencies and/or to notify plaintiffs' parents and/or to remove Loholt from their properties would result in Loholt sexually abusing innocent children including plaintiffs.

4.10 As a result of the molestation and breach of trust, plaintiffs have suffered and will continue to suffer physical and emotional pain and dysfunction to their general, non-economic damage in an amount to be determined. As a further result of the sexual abuse, each plaintiff has incurred and/or will continue to incur costs for counseling and psychological treatment, and has lost earning capacity to his damage in an amount to be proved at trial.

**V. SECOND CAUSE OF ACTION --
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)**

5.1 Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth under this count and further allege:

5.2 Defendants know or should have known that Loholt was a dangerous child molester,

5.3 Defendants further know or should have known that it was substantially certain that Loholt would continue to sexually abuse children, including plaintiffs, if it failed to warn parents or failed to report Loholt to civil authorities and that such abuse would result in severe emotional distress in the plaintiffs.

5.4 Defendants' conduct was an outrageous violation of societal norms and went so far beyond all possible bounds of decency, so as to be regarded as atrocious, and utterly intolerable in a civilized community, and resulted in severe emotional distress.

COMPLAINT FOR DAMAGES - 6 of 8

0
[162353 vJ.doc]

LAW OFFERS
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHEIM LLP
ONE UNION SQUARE
SUITE 2000, NEW YORK, NY 10036
TELEPHONE: (212) 410-1100
FACSIMILE: (212) 410-1101

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

5.5 Defendants' conduct was the result of a willful, reckless and outrageous indifference to a highly unreasonable risk of harm and a conscious indifference to the health, safety and welfare of plaintiffs. Defendants' conduct is outrageous, socially intolerable and far outside the bounds of human decency in a civilized society. Defendants are given notice that plaintiffs intend to seek an award of exemplary damages allowed by RCW 9.68A.130 and other law.

5.6 As a further result of the sexual abuse, each plaintiff has incurred and/or will continue to incur costs for counseling and psychological treatment, and has lost earning capacity in an amount to be proved at trial. As a result of the defendants' conduct, plaintiffs have suffered and will continue to suffer physical and emotional pain and dysfunction to their general, non-economic damage in an amount to be proved at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that the Court enter a judgment against the defendants, jointly and severally, and in plaintiffs' behalf, for the following:

1. For special damages for medical treatment expenses, lost earnings, and lost earnings capacity, and the expenses of medication and other special expenses, both in the past and continuing into the future, in amounts to be determined at the time of trial;

2. For all general damages, for physical, mental and emotional injury and disturbance, and other disorders resulting from the acts complained of herein;

3. For attorney's fees, prejudgment interest, costs and exemplary damages allowed by RCW 9.68A.130 and other law; and

COMPLAINT FOR DAMAGES - 7 of 8

0
[Complaint - Attachment]

LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANOA,
PETERSON & DAHEIM LLP
ONE UNIVERSITY, SUITE 2100
SEATTLE, WASHINGTON 98101-4143
(206) 464-7100 • FAX (206) 464-7143

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
1000
1001
1002
1003
1004
1005
1006
1007
1008
1009
1010
1011
1012
1013
1014
1015
1016
1017
1018
1019
1020
1021
1022
1023
1024
1025
1026
1027
1028
1029
1030
1031
1032
1033
1034
1035
1036
1037
1038
1039
1040
1041
1042
1043
1044
1045
1046
1047
1048
1049
1050
1051
1052
1053
1054
1055
1056
1057
1058
1059
1060
1061
1062
1063
1064
1065
1066
1067
1068
1069
1070
1071
1072
1073
1074
1075
1076
1077
1078
1079
1080
1081
1082
1083
1084
1085
1086
1087
1088
1089
1090
1091
1092
1093
1094
1095
1096
1097
1098
1099
1100
1101
1102
1103
1104
1105
1106
1107
1108
1109
1110
1111
1112
1113
1114
1115
1116
1117
1118
1119
1120
1121
1122
1123
1124
1125
1126
1127
1128
1129
1130
1131
1132
1133
1134
1135
1136
1137
1138
1139
1140
1141
1142
1143
1144
1145
1146
1147
1148
1149
1150
1151
1152
1153
1154
1155
1156
1157
1158
1159
1160
1161
1162
1163
1164
1165
1166
1167
1168
1169
1170
1171
1172
1173
1174
1175
1176
1177
1178
1179
1180
1181
1182
1183
1184
1185
1186
1187
1188
1189
1190
1191
1192
1193
1194
1195
1196
1197
1198
1199
1200
1201
1202
1203
1204
1205
1206
1207
1208
1209
1210
1211
1212
1213
1214
1215
1216
1217
1218
1219
1220
1221
1222
1223
1224
1225
1226
1227
1228
1229
1230
1231
1232
1233
1234
1235
1236
1237
1238
1239
1240
1241
1242
1243
1244
1245
1246
1247
1248
1249
1250
1251
1252
1253
1254
1255
1256
1257
1258
1259
1260
1261
1262
1263
1264
1265
1266
1267
1268
1269
1270
1271
1272
1273
1274
1275
1276
1277
1278
1279
1280
1281
1282
1283
1284
1285
1286
1287
1288
1289
1290
1291
1292
1293
1294
1295
1296
1297
1298
1299
1300
1301
1302
1303
1304
1305
1306
1307
1308
1309
1310
1311
1312
1313
1314
1315
1316
1317
1318
1319
1320
1321
1322
1323
1324
1325
1326
1327
1328
1329
1330
1331
1332
1333
1334
1335
1336
1337
1338
1339
1340
1341
1342
1343
1344
1345
1346
1347
1348
1349
1350
1351
1352
1353
1354
1355
1356
1357
1358
1359
1360
1361
1362
1363
1364
1365
1366
1367
1368
1369
1370
1371
1372
1373
1374
1375
1376
1377
1378
1379
1380
1381
1382
1383
1384
1385
1386
1387
1388
1389
1390
1391
1392
1393
1394
1395
1396
1397
1398
1399
1400
1401
1402
1403
1404
1405
1406
1407
1408
1409
1410
1411
1412
1413
1414
1415
1416
1417
1418
1419
1420
1421
1422
1423
1424
1425
1426
1427
1428
1429
1430
1431
1432
1433
1434
1435
1436
1437
1438
1439
1440
1441
1442
1443
1444
1445
1446
1447
1448
1449
1450
1451
1452
1453
1454
1455
1456
1457
1458
1459
1460
1461
1462
1463
1464
1465
1466
1467
1468
1469
1470
1471
1472
1473
1474
1475
1476
1477
1478
1479
1480
1481
1482
1483
1484
1485
1486
1487
1488
1489
1490
1491
1492
1493
1494
1495
1496
1497
1498
1499
1500
1501
1502
1503
1504
1505
1506
1507
1508
1509
1510
1511
1512
1513
1514
1515
1516
1517
1518
1519
1520
1521
1522
1523
1524
1525
1526
1527
1528
1529
1530
1531
1532
1533
1534
1535
1536
1537
1538
1539
1540
1541
1542
1543
1544
1545
1546
1547
1548
1549
1550
1551
1552
1553
1554
1555
1556
1557
1558
1559
1560
1561
1562
1563
1564
1565
1566
1567
1568
1569
1570
1571
1572
1573
1574
1575
1576
1577
1578
1579
1580
1581
1582
1583
1584
1585
1586
1587
1588
1589
1590
1591
1592
1593
1594
1595
1596
1597
1598
1599
1600
1601
1602
1603
1604
1605
1606
1607
1608
1609
1610
1611
1612
1613
1614
1615
1616
1617
1618
1619
1620
1621
1622
1623
1624
1625
1626
1627
1628
1629
1630
1631
1632
1633
1634
1635
1636
1637
1638
1639
1640
1641
1642
1643
1644
1645
1646
1647
1648
1649
1650
1651
1652
1653
1654
1655
1656
1657
1658
1659
1660
1661
1662
1663
1664
1665
1666
1667
1668
1669
1670
1671
1672
1673
1674
1675
1676
1677
1678
1679
1680
1681
1682
1683
1684
1685
1686
1687
1688
1689
1690
1691
1692
1693
1694
1695
1696
1697
1698
1699
1700
1701
1702
1703
1704
1705
1706
1707
1708
1709
1710
1711
1712
1713
1714
1715
1716
1717
1718
1719
1720
1721
1722
1723
1724
1725
1726
1727
1728
1729
1730
1731
1732
1733
1734
1735
1736
1737
1738
1739
1740
1741
1742
1743
1744
1745
1746
1747
1748
1749
1750
1751
1752
1753
1754
1755
1756
1757
1758
1759
1760
1761
1762
1763
1764
1765
1766
1767
1768
1769
1770
1771
1772
1773
1774
1775
1776
1777
1778
1779
1780
1781
1782
1783
1784
1785
1786
1787
1788
1789
1790
1791
1792
1793
1794
1795
1796
1797
1798
1799
1800
1801
1802
1803
1804
1805
1806
1807
1808
1809
1810
1811
1812
1813
1814
1815
1816
1817
1818
1819
1820
1821
1822
1823
1824
1825
1826
1827
1828
1829
1830
1831
1832
1833
1834
1835
1836
1837
1838
1839
1840
1841
1842
1843
1844
1845
1846
1847
1848
1849
1850
1851
1852
1853
1854
1855
1856
1857
1858
1859
1860
1861
1862
1863
1864
1865
1866
1867
1868
1869
1870
1871
1872
1873
1874
1875
1876
1877
1878
1879
1880
1881
1882
1883
1884
1885
1886
1887
1888
1889
1890
1891
1892
1893
1894
1895
1896
1897
1898
1899
1900
1901
1902
1903
1904
1905
1906
1907
1908
1909
1910
1911
1912
1913
1914
1915
1916
1917
1918
1919
1920
1921
1922
1923
1924
1925
1926
1927
1928
1929
1930
1931
1932
1933
1934
1935
1936
1937
1938
1939
1940
1941
1942
1943
1944
1945
1946
1947
1948
1949
1950
1951
1952
1953
1954
1955
1956
1957
1958
1959
1960
1961
1962
1963
1964
1965
1966
1967
1968
1969
1970
1971
1972
1973
1974
1975
1976
1977
1978
1979
1980
1981
1982
1983
1984
1985
1986
1987
1988
1989
1990
1991
1992
1993
1994
1995
1996
1997
1998
1999
2000
2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
2022
2023
2024
2025
2026
2027
2028
2029
2030
2031
2032
2033
2034
2035
2036
2037
2038
2039
2040
2041
2042
2043
2044
2045
2046
2047
2048
2049
2050
2051
2052
2053
2054
2055
2056
2057
2058
2059
2060
2061
2062
2063
2064
2065
2066
2067
2068
2069
2070
2071
2072
2073
2074
2075
2076
2077
2078
2079
2080
2081
2082
2083
2084
2085
2086
2087
2088
2089
2090
2091
2092
2093
2094
2095
2096
2097
2098
2099
2100
2101
2102
2103
2104
2105
2106
2107
2108
2109
2110
2111
2112
2113
2114
2115
2116
2117
2118
2119
2120
2121
2122
2123
2124
2125
2126
2127
2128
2129
2130
2131
2132
2133
2134
2135
2136
2137
2138
2139
2140
2141
2142
2143
2144
2145
2146
2147
2148
2149
2150
2151
2152
2153
2154
2155
2156
2157
2158
2159
2160
2161
2162
2163
2164
2165
2166
2167
2168
2169
2170
2171
2172
2173
2174
2175
2176
2177
2178
2179
2180
2181
2182
2183
2184
2185
2186
2187
2188
2189
2190
2191
2192
2193
2194
2195
2196
2197
2198
2199
2200
2201
2202
2203
2204
2205
2206
2207
2208
2209
2210
2211
2212
2213
2214
2215
2216
2217
2218
2219
2220
2221
2222
2223
2224
2225
2226
2227